RELIABILITY BENEFITS OF PRICE-RESPONSIVE DEMAND

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RETAIL LOADS SHOULD BE ABLE TO PARTICIPATE IN ALL WHOLESALE MARKETS

- Day-ahead energy and congestion management
- Day-ahead ancillary services
 - Spinning reserves
 - Nonspinning reserves
 - Replacement reserves

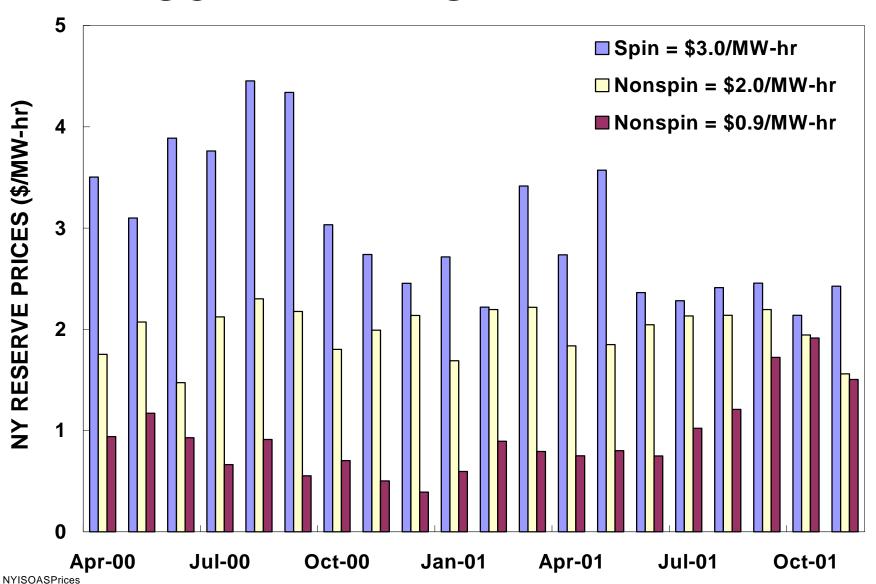
Loads should be able to set prices, not just be price takers!

- Real-time (intrahour) energy and congestion management
- Involuntary load interruptions

CURRENT POLICIES LIMIT DEMAND PARTICIPATION

- NERC Policy 1 limits spinning reserve to "unloaded generation that is synchronized ..."
 - At least 50% of contingency reserves must be spinning
- But NERC Disturbance Control Standard calls only for 15-minute recovery with no intermediate response
- Demand exclusion affects reliability and economic efficiency
 - Limits amount of reliability resources
 - Raises cost to maintain reliability
- Proposed Policy 1 changes are technology neutral

DEMAND EXCLUDED FROM LUCRATIVE RESERVE MARKET



MUNICIPAL WATER SYSTEMS COULD PROVIDE SPINNING RESERVE

- Water treatment/pumping = 3 4% of U.S. electric use
- Storage in pipelines and tanks makes spinning reserve feasible
 - could provide up to 50% of U.S. spin needs
- Adjustable speed drives would
 - enable provision of spin
 - improve efficiency of water operations
 - eliminate congestion concerns
 - improve local voltage regulation
- Other customers with storage also good candidates

INVOLUNTARY LOAD INTERRUPTIONS UNCOMPENSATED

- Last resort, interrupt loads to protect power system:
 - rolling blackouts, under-frequency and under-voltage relays
- Generators paid for contingency reserves, so loads should be paid for bulk-power interruptions
- If loads paid, say, \$1000/MWh-interrupted, some customers will pay more to avoid interruptions and others will accept less to be interrupted
 - lead to interruption markets

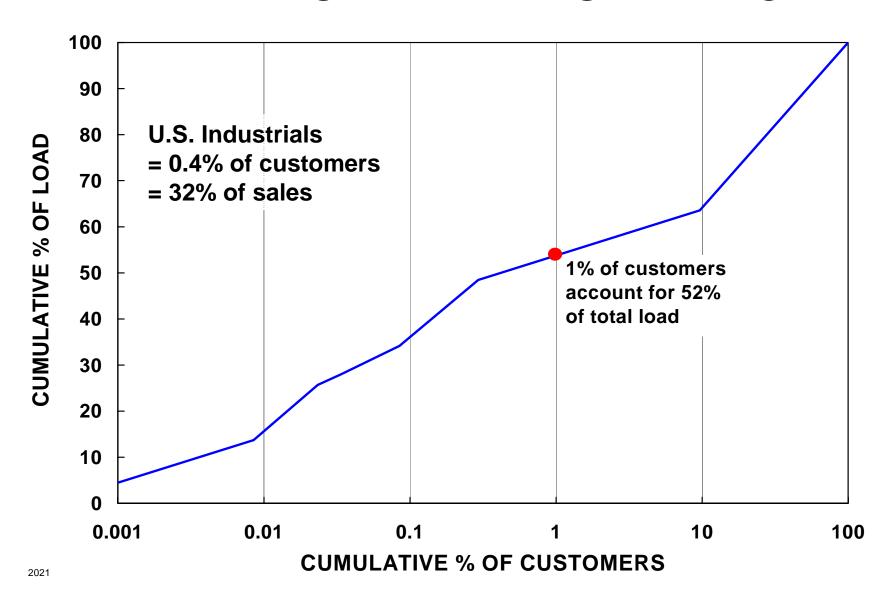
KEY QUESTIONS

- Will regulators permit customers to face realtime prices
- Will customers
 - choose to do so
 - respond to realtime prices
- Will technologies and programs be cost effective
- Should RTOs
 - Accommodate price-responsive demand or
 - Create markets and run programs

ELECTRICITY PRICE HAS TWO COMPONENTS

- The electricity commodity (kWh)
- Insurance (risk management)
 - Price protection
 - Quantity protection
- Customers and regulators need to recognize both elements of electricity pricing!
- See my paper on "Financial and Physical Insurance Benefits..."

ONLY A FEW LARGE CUSTOMERS NEEDED TO HAVE LARGE EFFECT



REGULATORY BARRIERS MAY BE LARGEST OBSTACLE TO PRD

- Standard-offer services priced too low (ignoring risk-management part of price)
 - Robs customers of incentive to cut demand
 - Prevents competitors from competing
- Load profiling: prevents suppliers and customers from responding to dynamic pricing
- Metering competition: Indecision delays installation of interval meters and communication systems
- Utilities: lost distribution revenues, potential stranded costs, loss of high-load-factor customers from standard tariff, ISO vs utility programs
- FERC price caps
- FERC vs PUC jurisdiction

INSTITUTIONAL OBSTACLES MATTER

- Widespread beliefs that
 - Electricity prices should be time invariant
 - Customers will not (cannot) respond to dynamic prices
- Reliability community and ISOs focus on supply
 - Demand assumed to be fixed (i.e., price inelastic)
 - Software limitations for scheduling and dispatch
- Suppliers, especially those with market power, lose money if demand is price responsive

WHAT SHOULD PUCs DO?

- Ensure standard-offer service is priced fairly
 - Consistent with wholesale prices
 - Recognizes insurance premium
- Require installation of interval meters, especially for larger customers (e.g., > 20 kW)
- Decide whether metering and communications is to be competitive or remain a monopoly service
- Encourage all retail providers to offer priceresponsive demand programs, protect utility from lost distribution revenues

WHAT SHOULD FERC AND RTOS DO?

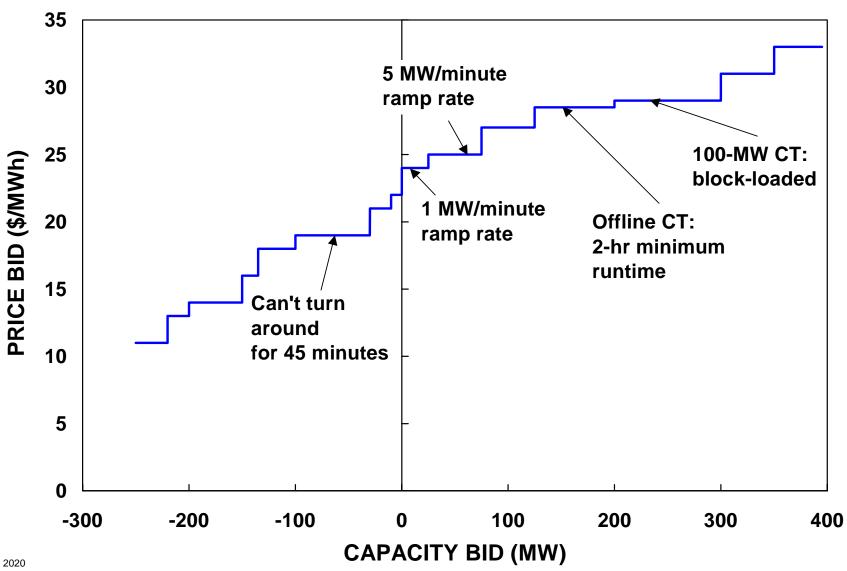
FERC

- Use bully pulpit to promote price-responsive demand
- Require ISOs and RTOs to accommodate PRD
- Avoid price caps

RTOs

- Ensure fair and consistent treatment of demand and supply in markets and operations
- Permit demand to bid into all energy, congestion, and ancillary-service markets
- Pay loads for involuntary interruptions
- Offer programs?

RTOs RECOGNIZE SUPPLY DIFFERENCES, DO SAME FOR DEMAND



DYNAMIC PRICING HAS BRIGHT FUTURE IF WE ...

- Eliminate regulatory (PUC) barriers
 - Recognize costs to supplier of providing timeinvariant prices
 - Permit recovery of these risk-management costs
 - Balance promotion of competition with desire to "protect" customers
- Educate customers on benefits of, and how to respond to, time-varying prices
- Overcome technical obstacles
 - Demonstrate metering, communications, and control technologies
 - Lower costs of these technologies